

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA	:	
	:	
	:	
vs.	:	1:21-CR-260
	:	
	:	
CRISTIAN AREVALO ARIAS,	:	
	:	
	:	
Defendant.	:	Honorable Leonie M. Brinkema
	:	

MOTION TO AMEND ORDER

The Accused, Cristian Arevalo Arias, respectfully moves this Court to amend its Order regarding the jury list to permit non-attorney defense team members to view the jury information. *See* Doc. 625. In support of this Motion, counsel states as follow:

1. Trial in this case is scheduled to begin on October 2, 2023. Per the Court's order, "it will not be possible for counsel to have a list of potential jurors until late Monday, September 25, 2023." Doc. 625 at 1.
2. Today, the Court entered an order limiting the proposed jury list to "counsel's eyes only." *Id.*
3. During trial preparation, trial counsel typically relies on other defense team members (e.g., investigators and paralegals) to review and organize the information pertaining to prospective jurors.
4. Mr. Arevalo's delayed indictment, expert budgeting issues, and the timing of the jury list make it impossible for counsel to personally review and organize the juror information. Thus, it is particularly important for counsel to have the assistance of other defense team members with this task.
5. Consequently, undersigned counsel asks the Court to amend the Order to say "the

proposed list is for defense team member eyes only,” as opposed to “for counsel’s eyes only.”

CONCLUSION

WHEREFORE, Mr. Arevalo respectfully moves this Honorable Court to amend the jury list order. A proposed amended order is attached.

Respectfully submitted,
CRISTIAN AREVALO ARIAS

s/ Bernadette Donovan

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Counsel for Cristian Arevalo Arias

CERTIFICATE OF SERVICE

I, Bernadette Donovan, Esq., hereby certify that on this September 22, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record. A Notice of Electronic Filing will be served on:

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s/ Bernadette M. Donovan